

**QUINTAIROS, PRIETO, WOOD & BOYER, P.A.**

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*CKS Prime Investments, LLC a/k/a*

*CKS Prime Investment and*

*Velocity Portfolio Group, Inc.*

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF NEVADA**

Fawaz Khouri,

Plaintiff,

v.

Equifax Information Services, LLC; Experian  
Information Solutions, Inc.; CKS Prime  
Investments, LLC a/k/a CKS Prime Investment;  
Velocity Portfolio Group, Inc.; and CKS  
Financial, LLC a/k/a CKS Financial,

Defendants.

Case No. 2:21-cv-2162-CDS-NJK

**DEFENDANTS' JOINT MOTION TO  
EXTEND THE DEADLINES  
[First Request]**

Defendant Experian Information Solutions, Inc., by and through its counsel, Jennifer L. Braster, Esq. and Benjamin B. Gordon, Esq. of Naylor & Braster, Defendant CKS Financial, LLC a/k/a CKS Financial, by and through its counsel Sean P. Flynn, Esq. of Gordon Rees Scully Mansukhani, LLP, and Defendants CKS Prime Investments, LLC a/k/a/ CKS Prime Investment and Velocity Portfolio Group, Inc., by and through their counsel Michael Ayers, Esq. and Clark Vellis, Esq. of Quintairos, Prieto, Wood & Boyer, P.A. ("Defendants" and jointly the "Parties"),

1 hereby jointly move to modify the Stipulated Discovery Plan and Scheduling Order (ECF No.  
2 19), entered on March 7, 2022, as follows:<sup>1</sup>

- 3 1. Discovery cutoff date: from July 19, 2022 to **November 16, 2022**;
- 4 2. Dispositive motions: from August 18, 2022, to **December 16, 2022**; and
- 5 3. Pretrial Order from September 19, 2022, to **January 17, 2023**.

6 Pursuant to LR 26-3, good cause exists to amend the Scheduling Order. The  
7 Parties have diligently pursued discovery and are in the process of finalizing all discovery in this  
8 action. Moreover, the Parties are seeking to only extend the remaining deadlines.

9 Pursuant to LR 26-3(a), the Parties propounded written discovery requests, with certain  
10 of the responses already having been served, served their Rule 26 disclosures, and are working  
11 together to finalize the remaining depositions of the Parties and their representatives. Experian  
12 has already noticed Plaintiff's deposition for July 18, 2022. Plaintiff has noticed depositions as  
13 well, which are being rescheduled to accommodate witnesses' and counsel's availability.

14 Pursuant to LR 26-3(b), the Parties request additional time to respond to  
15 written discovery requests, conduct any remaining written discovery, and take depositions of the  
16 Parties.

17 Pursuant to LR 26-3(c), the reason the remaining discovery was not  
18 complete within the time limits set by the discovery plan have been hindered by cases of COVID-  
19 19, location of the parties throughout the United States, and accommodating the schedules of the  
20 numerous parties.

21 Pursuant to LR 26-3(d), the Parties' proposed discovery schedule is listed above.

22 This Joint Motion is brought in good faith and not for the purposes of delay. This is also  
23 the Parties' first request for an extension of these deadlines, as requested above.

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27 <sup>1</sup> Plaintiff has indicated its willingness to extend the discovery deadlines, but only if the expert  
28 disclosure deadlines were reopened. Plaintiff has not demonstrated at this juncture good cause  
for reopening deadlines that have since passed.

Therefore, the Defendants hereby request that the Court grant this Joint Motion to Extend the Remaining Deadlines.

Dated: June 27, 2022

Dated: June 27, 2022

**QUINTAIROS, PRIETO, WOOD &  
BOYER, P.A.**

**NAYLOR & BRASTER ATTORNEYS  
AT LAW, PLLC**

By: /s/ Michael Ayers

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*Investments; and Velocity Portfolio*

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By: /s/ Jennifer L. Braster

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*Experian Information Solutions, Inc.*

Dated: June 27, 2022

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MANSUKHANI, LLP**

By: /s/ Sean P. Flynn

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*Financial LLC a/k/a CKS Financial*

### **AMENDED SCHEDULING ORDER**

The above Joint Motion to Extend Deadlines of the Parties shall amend the March 7, 2022, Discovery Plan and Scheduling Order (ECF No. 19) for this action, pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.

DATED: \_\_\_\_\_ IT IS SO ORDERED:

\_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE